

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

BIG LOTS, INC., *et al.*,

Debtors.¹

Chapter 11

Case No. 24-11967 (JKS)

(Jointly Administered)

Re: D.I. 2378

**CERTIFICATION OF COUNSEL REGARDING OMNIBUS ORDER
(I) AUTHORIZING THE DEBTORS TO (A) REJECT CERTAIN UNEXPIRED LEASES
EFFECTIVE AS OF MARCH 24, 2025 AND (B) ABANDON CERTAIN PERSONAL
PROPERTY AND (II) GRANTING RELATED RELIEF**

The undersigned counsel to the above-captioned debtors and debtors in possession (the “**Debtors**”) hereby certify as follows:

1. On October 9, 2024, the Court entered an *Order (I) Authorizing Debtors to Reject Certain Unexpired Leases of Nonresidential Real Property and (II) Authorizing and Establishing Procedures to Reject Executory Contracts and Unexpired Leases* (D.I. 461) (the “**Lease Rejection Procedures Order**”).

2. Pursuant to the Lease Rejection Procedures Order, on March 24, 2025, the Debtors filed the *Thirty-Eighth Notice of Rejection of Certain Executory Contracts and/or Unexpired Leases (and the Abandonment of Property)* (D.I. 2378) (the “**Thirty-Eighth Rejection Notice**”).

¹ The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores - PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores - CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277). The address of the debtors’ corporate headquarters is 4900 E. Dublin-Granville Road, Columbus, OH 43081.

3. The deadline to object to the Thirty-Eighth Rejection Notice was April 7, 2025, at 4:00 p.m. (ET). Prior to the objection deadline, counsel to PepsiCo requested clarifying language that nothing contained in Order would impact any ownership interest of PepsiCo. The Debtors have added such language to paragraph three (3) of a revised form of order (the “**Revised Order**”). The Debtors are unaware of any other objections or comments to the Thirty-Eighth Rejection Notice.

4. Attached hereto as **Exhibit A** is the Revised Order approving the Thirty-Eighth Rejection Notice and authorizing the Debtors to reject the lease set forth in the notice as of March 24, 2025. For the convenience of the Court and all parties in interest, a redline of the Revised Order against the form of order filed with the Thirty-Eighth Rejection Notice is attached hereto as **Exhibit B**. The Debtors now seek entry of the Revised Order with respect to the lease set forth in the Thirty-Eighth Rejection Notice.

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WHEREFORE, the Debtors respectfully request that the Court enter the Revised Order attached hereto as **Exhibit A** at its earliest convenience.

Dated: April 9, 2025
Wilmington, Delaware

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